REMARKS

Claims 1-54 were previously pending in this application. Applicant respectfully requests reconsideration of the instant application in view of the foregoing amendments and/or the following remarks. By this Amendment/Response, new claims 55-56 have been added and claims 1, 2, 21-29, 31, 39 and 40 have been amended to provide clarification, improve form, and/or correct minor typographical informalities. Applicant submits that support for the amended claims may be found throughout the originally filed specification, drawings and claims, and that no new matter has been added by way of this Amendment/Response. Applicant maintains that the original claims are in condition for allowance and explicitly reserves the right to add/pursue the original claims at a later time and/or in one or more continuation and/or divisional applications. Claims 1-56 are currently pending.

Claim Objections

Claims 21-29 and 39 have been objected to as allegedly containing particular informalities. Specifically, the pending rejection has, "suggested to change 'computer-readable medium to 'non-transitory computer-readable medium' to avoid any potential problems under 35 USC 101" (March 1, 2010 Office Action, p. 2, § 3). Although Applicant submits that the claims are clearly compliant with the requirements of 35 U.S.C. § 101, Applicant has amended the claims to provide clarification and improve form. For example, amended claim 21 recites, *inter alia*, "A non-transitory computer-readable medium."

Accordingly, Applicant submits that the Examiner's objections to the claims have been overcome.

Claim Rejections - 35 U.S.C. § 103

Claims 1, 2, 4-6, 21, 22, 30, 31, 39 and 40 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Cooley, U.S. Patent Application no. 2003/0055979 (hereinafter, "Cooley") in view of Jinmei et al., U.S. Patent Application no. 2005/0076139 (hereinafter, "Jinmei") and in further view of Yip et al., U.S. Patent no. 6,980,5550 (hereinafter, "Yip") and in further view of Liston, U.S. Patent Application no. 2004/0103314 (hereinafter, "Liston"); claims 3 and 7 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Cooley in view of Jinmei and in further view of Yip and in further view of Liston and in further view of Hamzy et al., U.S. Patent no. 6,941,368 (hereinafter, "Hamzy"); claims 8-11, 25, 26, 29, 34, 35, 38, 44 and 45 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Cooley in view of Jinmei and in further view of Yip and in further view of Liston and in further view of Chari et al., U.S. Patent Application no. 2004/0019781 (hereinafter, "Chari"); and claims 12, 27, 36 and 46 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Cooley in view of Jinmei and in further view of Yip and in further view of Liston and in further view of Chari and in further view of Griffiths et al., U.S. Patent no. 6,286,045 (hereinafter, "Griffiths"). Although Applicant respectfully traverses these rejections and submits that a *prima facie* showing of obviousness has not been established and that the applied references, taken individually or in combination, fail to discuss or render obvious every element of each

pending claim, Applicant has amended the claims to provide clarification, improve form, and/or correct minor typographical informalities.

Amended independent claim 1 recites, *inter alia*,

> A processor-implemented method of detecting unauthorized attempts to a network, comprising:
> ...
> detecting an unauthorized attempt to access said address when an attempted address corresponds to at least one unused substitute of a group of unused substitute addresses in said block of substitute addresses, wherein said group of unused substitute addresses is user-specific.

Applicant submits that at least these elements, recited by independent claim 1, are not discussed or rendered obvious by the applied references, taken individually or in combination. The pending rejection alleges that, "Liston teaches ... detecting unauthorized attempts when the request corresponds to an unused address (see paragraph [0031]," and that the references "disclose[] hashing a user address of said user to obtain one value of the range of values mapping to said block of substitute addresses, said one value designating said used one of said block of substitute addresses (see Yip et al. column 3 lines 41-48 and 55-67)" (March 1, 2010 Office Action, p. 3 ¶ 4 to p. 4 ¶ 1). Applicant respectfully traverses these rejections and submits that each reference is deficient in discussing or rendering obvious the claim elements discussed above, and that, even *in arguendo*, if the references could be combined, they would fail to yield at least the elements discussed above.

By way of example, Applicant notes that Cooley is directed to a system for responding to a domain name submission by returning the fastest IP address from a group of IP addresses corresponding to that domain name (see, e.g., Cooley, Abstract). Thus, not only are

none of the addresses in Cooley "substitute addresses" or "unused substitute addresses," since all of them correspond to the resource addressed by the domain name submission, but there is clearly no "group of unused substitute addresses" that is "user-specific," as recited by amended independent claim 1.

Liston is directed to "protecting against unauthorized users probing computer networks" by "creating virtual machines to occupy unused Internet Protocol (IP) addresses within the local computer network" (see, e.g., Liston, Abstract and ¶ 0030). Any "unused Internet Protocol (IP) addresses" in Liston's computer network are static and the same regardless of the user attempting to access them. Clearly, Liston's addresses are not "substitute addresses" and Liston plainly does not discuss or render obvious at least "wherein said group of unused substitute addresses is user-specific," as recited by amended independent claim 1.

Yip's system is directed to load-sharing of data packets across multiple servers, wherein the selected server for a given data packet is selected based on a hashing function which may be applied to a source address and a destination address (see, e.g., Yip, col. 3, lines 41-67). As Yip's system merely selects an address corresponding to a server, it has no "substitute addresses" or "unused substitute addresses," and does not discuss or render obvious at least "wherein said group of unused substitute addresses is user-specific," as recited by amended independent claim 1.

Jinmei is directed to a name server system for generating IP addresses (or host names) in response to normal (or reverse) look-up requests, including the generation of

"pseudo IP addresses" when the IP address corresponding to the specific host name requested is not obtained (see Jinmei, Abstract and ¶ 0015). Applicant submits that an inoperable pseudo IP address is not a "substitute address," nor does Jinmei discuss any "unused substitute address of a group of unused substitute addresses," as recited by amended independent claim 1. Finally, it is plain that the name server in Jinmei is agnostic to any user information in correlating host names and IP addresses, and that Jinmei does not discuss or render obvious at least, "wherein said group of unused substitute addresses is user-specific," as recited by amended independent claim 1.

Applicant further submits that Hamzy, which describes enforcement of prerequisite resource serving; Chari, which describes a hash-based request routing scheme; and Griffiths, which describes intelligent control of information delivery over a network, all fail to remedy the deficiencies identified above with regard to the other applied references. Not only do none of the applied references discuss or render obvious at least the elements discussed above, but no combination of those references would yield those elements either. For example, in any combination of the applied references, any detection of an unauthorized access attempt would be user agnostic and would not occur "when an attempted address corresponds to at least one unused substitute address of a group of unused substitute addresses" that "is user specific," as recited by amended independent claim 1.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of this basis of rejections. Should the Examiner maintain the rejection, Applicant respectfully requests clarification as to how and specifically where the Examiner believes the applied

references allegedly discuss, "detecting an unauthorized attempt to access said address when an attempted address corresponds to at least one unused substitute address of a group of unused substitute addresses ... wherein said group of unused substitute addresses is user-specific," as recited by amended independent claim 1.

Although of different scope than claim 1, Applicant submits that claim 21 is also patentable over the applied references, taken individually or in combination. For example, amended independent claim 21 recites, *inter alia*,

> A non-transitory computer-readable medium containing instructions for controlling a processor to detect unauthorized access attempts to a network by:
>
> ...
>
> detecting an unauthorized attempt to access said address when an attempted address corresponds to at least one unused substitute address of a group of unused substitute addresses in said block of substitute addresses, wherein said group of unused substitute addresses is user-specific.

Applicant respectfully submits that at least these elements recited by independent claim 21 are not discussed or rendered obvious by the applied references, taken individually or in combination, for at least similar reasons as those discussed above identifying deficiencies in the applied references with regard to independent claim 1. Accordingly, Applicant respectfully requests reconsideration and withdrawal of this basis of rejections.

Although of different scope than claim 1, Applicant submits that claim 21 is also patentable over the applied references, taken individually or in combination. For example, amended independent claim 21 recites, *inter alia*,

> A non-transitory computer-readable medium containing instructions for controlling a processor to detect unauthorized access attempts to a network by:
>
> ...
>
> detecting an unauthorized attempt to access said address when an attempted address corresponds to at least one unused substitute address of a group of unused substitute addresses in said block of substitute addresses, wherein said group of unused substitute addresses is user-specific.

Applicant respectfully submits that at least these elements recited by independent claim 21 are not discussed or rendered obvious by the applied references, taken individually or in combination, for at least similar reasons as those discussed above identifying deficiencies in the applied references with regard to independent claim 1. Accordingly, Applicant respectfully requests reconsideration and withdrawal of this basis of rejections.

Although of different scope than claim 1, Applicant submits that claim 30 is also patentable over the applied references, taken individually or in combination. For example, amended independent claim 30 recites, *inter alia*,

> A system for detecting unauthorized access attempts to a network by:
>
> ...
>
> means for detecting an unauthorized attempt to access said address when an attempted address corresponds to at least one unused substitute address of a group of unused substitute addresses in said block of substitute addresses, wherein said group of unused substitute addresses is user-specific.

Applicant respectfully submits that at least these elements recited by independent claim 30 are not discussed or rendered obvious by the applied references, taken individually or in combination, for at least similar reasons as those discussed above identifying

deficiencies in the applied references with regard to independent claim 1. Accordingly, Applicant respectfully requests reconsideration and withdrawal of this basis of rejections.

Although of different scope than claim 1, Applicant submits that claim 39 is also patentable over the applied references, taken individually or in combination. For example, amended independent claim 39 recites, *inter alia*,

> A computer program, disposed on a non-transitory computer-readable medium, for enabling detection unauthorized access attempts to a network, said computer program including instructions for causing a processor to:
>
> ...
>
> detect an unauthorized attempt to access said address when an attempted address corresponds to at least one unused substitute address of a group of unused substitute addresses in said block of substitute addresses, wherein said group of unused substitute addresses is user-specific.

Applicant respectfully submits that at least these elements recited by independent claim 39 are not discussed or rendered obvious by the applied references, taken individually or in combination, for at least similar reasons as those discussed above identifying deficiencies in the applied references with regard to independent claim 1. Accordingly, Applicant respectfully requests reconsideration and withdrawal of this basis of rejections.

Furthermore, Applicant submits that claims 2-20, 22-29, 31-38 and 40-56, which depend directly or indirectly from independent claims 1, 21, 30 and 39, are also not discussed or rendered obvious by the applied references, taken individually or in combination, for at least similar reasons as those discussed above identifying deficiencies in the applied references with regard to the independent claims. Accordingly, Applicant respectfully requests reconsideration and withdrawal of this basis of rejections.

CONCLUSION

In summary, Applicant submits that independent claims 1, 21, 30 and 39 are patentably distinct from the cited reference for at least the reasons discussed above. Applicant submits that claims 2-20, 22-29, 31-38 and 40-56, which are directly or indirectly dependent from independent claims 1, 21, 30 and 39, are also patentably distinct from the cited reference for at least the reasons discussed above.

As Applicant's remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicant's silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, ability to combine references, assertions as to patentability of dependent claims) is not a concession by Applicant that such assertions are accurate or such requirements have been met, and Applicant reserves the right to analyze and dispute such in the future. Furthermore, Applicant submits that the originally filed claims are patentably distinct from the cited reference. As such, Applicant reserves the right to pursue the originally filed claims, as well as claims directly or indirectly dependent on originally filed claims, in one or more continuation application(s). Accordingly, Applicant respectfully requests reconsideration/further examination of the instant application in view of the foregoing Amendments/Remarks.

Authorization

Applicant hereby authorizes and requests that the Commissioner charge any additional fees that may be required for consideration of this and/or any accompanying and/or necessary papers to Deposit Account No. 03-1240, Order No. 19161-010. In the event that an extension of time is required (or which may be required in addition to that requested in a petition for an extension of time), Applicant requests that the Commissioner grant a petition for an extension of time required to make this response timely, and, Applicant hereby authorizes and requests that the Commissioner charge any fee or credit any overpayment for such an extension of time to Deposit Account No. 03-1240, Order No. 19161-010.

In the event that a telephone conference would facilitate examination of the application in any way, Applicant invites the Examiner to contact the undersigned at the number provided.

Respectfully submitted,
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Dated: April 20, 2010

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